

EXHIBIT D

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

WILLIAM DAVID SEAL,
Plaintiff,

VERSUS CIVIL ACTION NO: 1:08cv175LG-RHW

HARRISON COUNTY, MISSISSIPPI,
by and through its Board of
Supervisors; HARRISON COUNTY
SHERIFF, George Payne, in his
official capacity; CORRECTIONS
OFFICER THOMAS PRESTON WILLS,
acting under color of state
law; CORRECTIONS OFFICER RYAN
TEEL, acting under color of
state law; CORRECTIONS OFFICER
MORGAN THOMPSON, acting under
color of state law,
Defendants.

DEPOSITION OF CRYSTAL GOMEZ

Taken at the offices of Dukes, Dukes,
Keating & Faneca, P.A., 2909 13th Street,
Sixth Floor, Gulfport, Mississippi, on
Wednesday, September 30, 2009, beginning
at 1:00 p.m.

APPEARANCES:

MARK V. WATTS, ESQUIRE
Brown Buchanan, P.A.
796 Vieux Marche' Mall, Suite 1
Biloxi, Mississippi 39530
ATTORNEY FOR PLAINTIFF

COPY

1 arrested. He was drunk.

2 Q. Did the cops tell him why he was under
3 arrest?

4 A. No.

5 Q. Did you hear him say anything --

6 A. The whole time I was trying to listen,
7 and I never heard them explain why he was under
8 arrest the whole time. And I could hear -- I

9 can't remember, but I could hear them. They never
10 would tell him why he was under arrest.

11 Q. Tell us exactly what the cop -- what you
12 remember the cop saying. Did they answer him or
13 say anything at all to him?

14 A. Nuh-uh, because -- I guess the reason is
15 because the more that they would try to get him
16 to -- I don't know how to explain him. The more
17 that they would try to get him to get up or
18 whichever the situation was, he just -- he just
19 questioning what's going on. So the cops were
20 getting frustrated with him, and they never would
21 answer them. And then before I knew it, they were
22 tugging on him, and they went down in the
23 driveway.

24 Q. Is that a gravel or concrete driveway?

25 A. Concrete.

1 Q. When you say "went down," did the cops
2 throw Mr. Seal down; could you see?

3 A. Yes.

4 Q. How many of them threw him down?

5 A. At least two. The first time, at least
6 two. And then I think that's when -- there could
7 have been already three cars there, but that's
8 when another cop -- that's when another cop came.

9 And they got him in handcuffs, and they drug him.
10 They didn't let him walk. They drug him to the
11 car, and I'm not sure which car.

12 Q. They drug him on the concrete?

13 A. Uh-huh.

14 Q. Is that yes?

15 A. Yes, sir.

16 Q. Okay.

17 A. They drug him to one of the cars, and he
18 still didn't understand why he was being arrested,
19 and he kept saying -- by then he was getting
20 shaky. He's an older man. And they were, you
21 know, beating him up and kicking him and hurting
22 him, and he's just screaming, why am I being
23 arrested. And he didn't understand why he was
24 being arrested. And by the time they got -- it
25 was right here. In between these cop cars, he was

1 in handcuffs.

2 Q. Put "HC" by that. We'll know that means
3 handcuffs.

4 A. HC.

5 Q. All right.

6 A. I assume maybe they were trying to take
7 him to 2. I don't want to say that because it's
8 assumption, but because they were in between the

9 cop cars makes me think that. He went down right
10 there again. And they had the batons, and they
11 were kicking him and hitting him with batons, and
12 I'm not --

13 Q. Where were they hitting him; could you
14 see?

15 A. On the side and everywhere.

16 Q. In the head?

17 A. They had -- they did hit him in the
18 head, mostly on the side. They were kicking him
19 on his side and hurting him. And my
20 eight-year-old -- well, now he's eight. He was
21 five at the time, four or five, and he saw that,
22 and he started to cry. So my ex-husband ran and
23 put him inside. And then, by then that's when the
24 police saw me, and only like one or two saw me at
25 the time, and then they kind of like -- I don't